

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Woodstone Limited Partnership;  
Lofts at Farmers Market LLC,

Case No. 22-CV-1589 NEB-JFD

Plaintiffs,

v.

**JOINT MOTION REGARDING  
CONTINUED SEALING**

City of Saint Paul, Minnesota, a Minnesota  
Charter City; City Council of the City of  
Saint Paul; Angie Wiese, in her official  
capacity as the Director of the Department  
of Safety and Inspections of the City of  
Saint Paul; Mayor Melvin Carter, in his  
official capacity as Mayor of the City of  
Saint Paul; and John Doe,

Defendants.

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Documents have been filed under temporary seal in connection with the following  
motion:

<i>Plaintiff's Motion for Partial Summary Judgment</i>	<i>Doc. 30</i>
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Pursuant to LR 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

<b>DKT. NO.</b>	<b>DKT. NO. OF REDACTED VERSION (IF FILED)</b>	<b>DESCRIPTION OF DOCUMENT</b>	<b>PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.</b>	<b>NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)</b>	<b>REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED</b>
35	N/A	Exhibit A to the Declaration of Lisa Moe	The parties agree the entire document should remain sealed.	N/A	The document is a form lease used by Plaintiff Woodstone Limited Partnership. Plaintiff contends that its form lease contains confidential and proprietary information that is not publicly available and that could be harmful to Plaintiff's competitive standing if disclosed. At this time, Defendants do not take a position on Plaintiff's arguments about the confidentiality of this document, and for purposes of this motion only Defendants do not object to the document remaining sealed.

<b>DKT. NO.</b>	<b>DKT. NO. OF REDACTED VERSION (IF FILED)</b>	<b>DESCRIPTION OF DOCUMENT</b>	<b>PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.</b>	<b>NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)</b>	<b>REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED</b>
42	N/A	Exhibit A to the Declaration of Greg Cerbana	The parties agree the entire document should remain sealed.	N/A	The document is an Offering Memorandum prepared by a non-party that Plaintiff Lofts at Farmers Market LLC agreed to keep confidential, as shown on page 102 of the document. At this time, Defendants do not take a position on Plaintiff's arguments about the confidentiality of this document, and Defendants do not object to the document remaining sealed.

<b>DKT. NO.</b>	<b>DKT. NO. OF REDACTED VERSION (IF FILED)</b>	<b>DESCRIPTION OF DOCUMENT</b>	<b>PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.</b>	<b>NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)</b>	<b>REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED</b>
43	N/A	Exhibit B to the Declaration of Greg Cerbana	The parties agree the entire document should remain sealed.	N/A	The document is a form lease used by Plaintiff Lofts at Farmers Market LLC. Plaintiff contends that its form lease contains confidential and proprietary information that is not publicly available and that could be harmful to Plaintiff's competitive standing if disclosed. At this time, Defendants do not take a position on Plaintiff's arguments about the confidentiality of this document, and for purposes of this motion only Defendants do not object to the document remaining sealed.

Dated: November 7, 2022

**ANTHONY OSTLUND LOUWAGIE  
DRESSEN & BOYLAN P.A.**

*s/ Philip J. Kaplan*

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Dated: November 7, 2022

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